



U.S. Department of Justice

*United States Attorney
District of New Jersey*

970 Broad Street, 7th floor
Newark, New Jersey 07102

973-645-2700

March 12, 2021

BY ECF

The Hon John Michael Vazquez
District Court Judge
United States Courthouse and Post Office
Newark, New Jersey 07102

Re: U.S. v. Michael Healy et al., Crim. No. 18-703

Dear Judge Vazquez:

The Government is respectfully requesting additional time to respond to defendant Michael Healy's recent motion filed in this matter (Dkt. No. 113). The Court has issued a scheduling order calling for the Government to respond by March 23, 2021. Since the filing of the motion on February 24, 2021, the Government has granted, at counsels' request, an additional extension for Mr. Healy to submit his mitigation information to the Acting United States Attorney for the District of New Jersey. That deadline was previously extended from January 20, 2021 to March 30, 2021. Now the Government has extended the deadline once again to June 30, 2021. In light of that extension, defense counsel for Mr. Healy have graciously consented to the Government's request for additional time to answer the present motion, which appears to be a case of first impression, necessitating further time to respond. The Government requests until April 30, 2021 for its response. Thank you for your consideration in this matter.

Very truly yours,

RACHAEL A. HONIG
Acting United States Attorney

S//Robert Frazer
By: Robert Frazer
Naazneen Khan
Assistant U.S. Attorneys

cc. Stephen Turano, Esq.
Thomas Ambrosio, Esq.